

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

HAMEL TOURE and ANDREA BURCH,
individually and on behalf all others similar
situated,

Plaintiffs,

v.

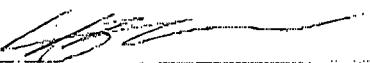
AMERIGROUP CORP. and AMERIGROUP
NEW YORK, LLC, d/b/a AMERIGROUP
Community Care

Defendants.

CONSENT TO BE A PARTY
PLAINTIFF

1. I consent to be a party plaintiff in a lawsuit against Amerigroup Corp., Amerigroup New York, LLC, and/or related entities and individuals in order to seek redress for alleged violations of the Fair Labor Standards Act, pursuant to 29 U.S.C. § 216(b).

2. By signing and returning this consent form, I hereby designate representative Plaintiffs Toure and Burch, and Plaintiffs' attorneys Outten & Golden LLP, Morgan & Morgan, P.A., and the Law Office of Justin A. Zeller ("Plaintiffs' Attorneys") to represent me in such lawsuit and to make decisions on my behalf concerning the litigation and any settlement. I agree to be bound by any adjudication of this action by a court, whether it is favorable or unfavorable and to be bound by any settlement entered into on my behalf by the representative Plaintiffs and Plaintiffs' attorneys. I understand that reasonable costs expended by Plaintiffs' Attorneys on my behalf will be deducted from any settlement or judgment amount on a pro rata basis among all other plaintiffs. I understand that Plaintiffs' Attorneys will petition the Court to award them attorneys' fees from any settlement or judgment in the amount of the greater of: (1) their "lodestar" amount, calculated by multiplying their reasonable hourly rates by the number of hours expended on the lawsuit, or (2) 1/3 of the gross settlement or judgment amount.


Signature

11-14-11

Date

ShiYong Chen
Print

 REDACTED

Address

Brooklyn NY 11209
City, State and Zip Code